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*Attorneys for TikTok Inc. and  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:  
  
ALL ACTIONS

**DEFENDANTS TIKTOK INC.'S AND  
BYTEDANCE INC.'S, RESPONSE TO  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS**

On February 14, 2023, Plaintiffs filed their Master Complaint (ECF No. 136). Pursuant to an agreement with Plaintiffs, the Master Complaint references, paraphrases, and quotes material from several documents that TikTok Inc. and ByteDance Inc. (hereinafter, "TikTok") provisionally designated as highly confidential until a protective order is entered and the documents can be designated thereto. Plaintiffs filed an Administrative Motion to Consider

1 Whether TikTok's Materials Should be Sealed (Master Complaint) (ECF No. 134),<sup>1</sup> pursuant to  
2 Civil Local Rules 7-11 and 79-5(f). Pursuant to these rules, and this Court's Order dated February  
3 14, 2023 (ECF No. 132) TikTok now responds to Plaintiffs' Administrative Motion.

4         TikTok does not move at this time to seal the references, paraphrases, or quotations in the  
5 Master Complaint directed to it, or redact this material from the public version of the Master  
6 Complaint. Although TikTok does not seek to designate as confidential the specific references,  
7 paraphrases, or quotations that Plaintiffs used, TikTok reserves all rights to protect the  
8 confidentiality of the documents from which Plaintiffs obtained the references, paraphrases, and  
9 quotations. TikTok does not waive any of its rights regarding the confidentiality of these  
10 documents and their contents, beyond what is explicitly included in the Master Complaint, for  
11 discovery or any other purpose. If any party moves to file any of these documents with the Court  
12 in the future or seeks to reference or quote any other portions of these documents in public filings,  
13 TikTok reserves all rights to move to seal any of these documents or portions thereof.  
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25 <sup>1</sup> In their Administrative Motion (ECF No. 134), Plaintiffs incorrectly refer to "Defendants  
26 TikTok, Ltd.; TikTok, LLC; TikTok, Inc.; ByteDance Ltd.; and ByteDance Inc." The only  
27 TikTok entities named in any suit in the MDL are ByteDance Inc. and TikTok Inc. The other  
28 entities identified in this list are not named defendants in any case consolidated in the MDL, nor  
have they been served with summonses. The rights of these entities to challenge service,  
jurisdiction, and venue are hereby preserved and explicitly not waived.

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4 DATED: February 28, 2023

Respectfully submitted,

FAEGRE DRINKER LLP

By: /s/ Andrea Roberts Pierson

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